

7110.2REV1Update of PFF Instrctns100388  
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REVISION 01 10/03/88

OPI: TS/PPID

UPDATE OF PROTEIN FAT FREE (PFF)  
INSTRUCTIONS

I. PURPOSE

The purpose of this directive is follows:

1. To provide updated information regarding the reporting of PFF Absolute Minimum Violations, and
2. To transmit an updated Questions and Answers Guide to the PFF Regulation, and
3. To transmit PFF Cured Pork Products Codes.

II. CANCELLATIONS

FSIS Directive 7110.2, dated 4/16/86  
FSIS Directive 7110.2, Amend. 1, dated 6/26/86

III. REASONS FOR REISSUANCE

To abolish the PFF Toll Free Telephone Line, update the Questions and Answers Guide, and add an attachment which specifies product codes for PFF.

IV. REFERENCES

MPI Regulations, Sections 318.19, 319.104, and 319.105.

V. REPORTING PFF ABSOLUTE MINIMUM VIOLATIONS

The PFF Toll Free telephone line for reporting Absolute Minimum Violations (AMV) of official results from accredited laboratories is terminated as of this directive. All future AMV are to be reported to the Regional Office by the inspector in charge (IIC) to verify calculations and coordinate the action to be taken. Operational questions are to be directed to the processing staff officer in the Regional Office.

Prior to calling the Regional Office to report PFF sample results, the IIC must have available the following information:

Establishment Number  
Inspector Name  
Group involved  
Product codes (s) (See Attachment 3.)

Product Name on Label  
Meat Protein Analysis from Submitted Sample  
Fat Analysis from the Submitted Sample  
Sample Request Form Number  
Three-Digit Sample Number  
PFF Value (Calculated by IIC)  
Group from the Sample Request Form (and Product Code)  
Sampling Phase (Periodic, Daily, Retention)

The data provided by the IIC will be entered into the computer for calculating the PFF Value, Group Value, Product Value or, in the case of retention, the average PFF sample value. These calculations on the PFF computer will take precedence over the IIC's calculations. Instructions will be given to the IIC on the action to be taken; e.g., retain product, release product, relabel product, change sampling phase, or identify products to be sampled.

#### VI. TRANSMISSION OF QUESTIONS AND ANSWERS GUIDE

Two video tapes are available from the Area Offices. The "Guide for PFF Analysis Sampling Program" dated July 1985 is available from the Regional Office and should be in all establishments producing cured pork products under PFF.

The attached question and answer guide was prepared in order to provide uniform interpretation and application of the regulations.

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#### ATTACHMENTS

- 1 Questions and Answers Guide - Cured Pork Products
- 2 Table to Determine X percent on Retained Product Label When Fat and PFF are Known
- 3 Product Codes and Minimum PFF

#### ATTACHMENT 1

##### I. PRODUCTS COVERED

1. Question: Are "canned, deviled ham, or ham loaf, and ham sausage" covered by the PFF regulation?

Answer: No. The only comminuted products covered by the PFF regulation are those labeled as "ham patties", "chopped ham", "pressed ham", and "spiced ham".

2. Question: Are country hams, country style hams, dry cured hams, and country pork shoulders covered by the PFF regulation?

Answer: No. These products are covered under 319.106 of the regulations.

3. Question: Are bacon and miscellaneous cured pork products such as hocks, ears, snouts, feet, knuckles, tails, fat back and jowls covered by the PFF regulation?

Answer: No. However, "Canadian Bacon" which is essentially a cured pork loin must meet the PFF standard for loins (product code 04).

4. Question: If an inspected and passed product is only being resmoked or sliced, is it subject to PFF sampling?

Answer: No, provided that the resmoked or sliced product bears the same common and usual name and qualifying statement (if any) as the initial product.

5. Question: Does the name of the cured pork product affect whether the product is subject to the PFF regulations?

Answer: Yes. If a fanciful name such as Deli Roll is used in lieu of the common and usual name, the product is not subject to the PFF regulations and there is no restriction on the added substance. However, descriptive labeling and a demonstration that the product is not nutritionally inferior to the traditional product may be necessary for some products.

## II. LABELING AND STANDARDS

6. Question: When are label applications stamped "Requires a QC Program?"

Answer: All labels for cured pork products labeled "(X) percent of weight is added ingredients" will be stamped with the QC stamp. The only exception to this is when the transmittal form has a statement on it such as

"THIS LABEL IS TO BE USED FOR RELABELING RETAINED PRODUCT ONLY."

7. Question: Can labels for "ham and water product-X percent of weight is added ingredients" be approved with a blank space where the percentage normally appears?

Answer: Yes, but only for relabeling purposes. The transmittal form must state that the label is only intended for use in relabeling and then only by the IIC who will determine the figure to be stamped in the space provided. The labels will not be stamped "Require a QC Program".

8. Question: When are qualifying statements required?  
Answer: Qualifying statements are needed on all products requiring terms such as "with natural juices", "water added" and "(X) percent of weight is added ingredients."

9. Question: What portion of the labeled product name is considered the qualifying statement for marking purposes?

Answer: That portion of the name which is in addition to the common and usual name.

Example:

Common or Usual Name	Qualifying Statement
Ham with Natural Juices	With Natural Juices
Ham Water Added	Water Added
Ham and Water Product	
20 percent of Weight is Added Ingredients	20 percent of Weight is Added Ingredients

10. Question: Are plants able to "Label out of trouble"?  
Answer: Yes, on a lot-by-lot basis during the retention phase, and by changing the label such as from "ham" to "ham with natural juices."

11. Question: Is it possible to relabel retained products rather than returning them to the official establishment?

Answer: Yes, under FSIS supervision.

12. Question: Is the relabeling of canned ham permitted?  
Answer: Yes.

13. Question: How should canned, lithograph labeled product be relabeled?

Answer: The method of relabeling should be proposed by the processor for FSIS approval. For example, the product may be repackaged in consumer size containers and relabeled accurately. On consumer size cans FSIS permits pressure sensitive stickers, if the adhesive is a type that will not permit the sticker to be removed.

14. Question: Can retained product be down-labeled using pressure sensitive stickers?

Answer: Yes, provided the adhesive is a type which will not permit the sticker to be removed and provided the sticker meets the applicable size/color requirements.

15. Question: If a processor is manufacturing a water added product

and the product fails to meet the standard for water added and can be relabeled as a and water product- percent of weight is added ingredients, how can the X percent to be shown on the label be determined?

Answer: There are several methods which can be used to determine the amount of added ingredients to be declared on the label of X percent product and any of them which may be adequate. Two of these methods are: (1) yield determinations based on plant records such as comparisons between the green weight and the finished weight of the product; (2) use of the USDA chart (see Attachment 2).

16. Question: Since the PFF regulation requires a quality control program for the production of an X percent product, is a processor who gets into trouble with water added product (product which does not meet the water added standard) allowed to relabel the product as X percent product without having a quality control program?

Answer: Yes. However, if such production becomes the rule rather than the exception, the processor will be prohibited from producing more X percent product until a quality control program is approved for use.

17. Question: Can Ham and Water Product be 50 percent ham and 50 percent other ingredients?

Answer: No. A ham and water product must be more than 50 percent ham.

18. Question: Are the PFF values the same for all products?

Answer: All products which are labeled with the same common and usual name (including the qualifying statement) must comply with the same standard. For example, a canned ham--water added, and a smoked ham--water added, must comply with the same PFF standard.

19. Question: What is the meaning of the term "cooked" which is used in the regulations?

Answer: The term "cooked" is used in the PFF regulation to refer to all processes where heat is applied to the product. For example, products labeled smoked, cooked, or fully cooked will be in the cooked category.

20. Question: If a product is heat treated for the destruction of live trichinae, why is it considered cooked by this regulation?

Answer: When a product is heated, the heating process will have a concentrating effect on the protein. Therefore, products that are heat treated are considered cooked for the purpose of this regulation and must meet the appropriate PFF standards.

21. Question: Is there any allowance made for the differences in protein content of fresh and PSE pork or frozen pork?

Answer: No.

22. Question: What is the PFF value for "Cured Pork"?

Answer: "Cured Pork", uncooked or heat treated, made from any combination of hams, loins, shoulders, butts, or picnics, in whole or in part, which is labeled; e.g., as a part of the product name, in the ingredients statement, qualifying statement, starburst, etc., to indicate the presence of any of the above parts is subject to the PFF value for pork shoulder. These products may be sectioned, chunked, diced, or ground. "Cured Pork" which is not labeled to indicate the presence of hams, loins, shoulders, butts, or picnics or "cured Pork" made from pork parts not covered by the PFF regulations; e.g., bellies, jowls, hocks, ears, fat-back, tails, etc., is not subject to the PFF regulations. If these products are subjected to heat treatment, the products must come back to the fresh uncured weight unless the product name specifically indicates the presence and percentage of the added substances above the fresh uncured weight. (See Policy Memo 084 issued by the Standards and Labeling Division.) If not subjected to heat treatment, the product may contain up to 10 percent added substance without label declaration. If more than 10 percent added substance is added, the presence and amount of the added substance must be declared as a part of the product name. Examples of acceptable names are "Cured Pork and X percent Water" and "Cured Pork and Water Product-X percent of Weight is Added Ingredients". Whenever a percent is included in the product name, a partial quality control (PQC) program is required. The above applies to "dry salt cured" product also .

23. Question: What is the PFF value for raw "cured pork trimmings"?

Answer: The PFF concept is not applicable to trimmings. The product may contain up to 10 percent added substance without label declaration. If more than 10 percent added substance is present, the presence and amount of the added substance must be declared as a part of the product name. Examples of acceptable names are: "Cured Pork Trimmings and X percent Water" and "Cured Pork Trimmings and Water Product-X percent of the Weight is Added Ingredients". Whenever a percent is indicated in the product name, a PQC program is required .

24. Question: How should a mixture of trimmings from various uncooked cured pork products be labeled?

Answer: A processor wishing to combine the trimmings from uncooked cured pork product, such as hams which were injected with various levels of curing solutions, must label these trimmings indicating the highest level of substances added over 10 percent, e.g., "Uncooked Cured Ham Trimmings Injected With Up to 25 percent of a Solution of Water, etc. " A PQC program is not required.

25. Question: Can more than one unit of unlabeled or unmarked PFF controlled cured pork product be shipped in a fully labeled immediate container?

Answer: No. Each unit of PFF controlled cured pork product must at least bear the inspection legend, the curing statement, and the appropriate qualifying statement (if applicable).

26. Question: Since FSIS permits "down labeling" under PFF, can all products be down labeled to an X percent product?

Answer: No. Only products produced to meet the water added requirement may be down labeled to an X percent product. Products such as ham or ham with natural juices may not be down labeled to an X percent product.

27. Question: Is labeling approved for less than 20 percent added ingredients for an X percent product?

Answer: No. However, labels submitted with less than 20 percent added ingredients are evaluated on a case-by-case basis.

28. Question: Is there an alternative to the size requirement for the qualifying statement labels for cured pork products?

Answer: Yes. An alternative to the 3/8 inch letter size requirement is that the qualifying statement must be at least 1/3 the size of the common and usual name in the same color and style print as the product name and on the same color background.

29. Question: Must products be labeled the full length of the product with a qualifying statement?

Answer: No.

30. Question: Since PFF accounts for all added substances in a cured pork product, is there any need to limit the use of liquid or solid sweeteners added to chopped ham.

Answer: No.

### III. SAMPLING

31. Question: What does the term "periodic" mean as it applies to the sampling rate?

Answer: "Periodic" sampling means sampling at a rate other than daily. All plants start in periodic sampling.

32. Question: At what point in the process is a PFF product to be sampled?

Answer: When it is ready to enter commerce, e.g., as a finished

consumer ready unit.

33. Question: Does an entire ham need to be taken as a sample?

Answer: A complete consumer ready unit is necessary for sampling. If that is an entire ham, an entire ham will be used as the sample. Alternative sample preparation may be used at the processors request, provided the equipment necessary for preparing the sample is available at the plant, that is, selecting a consumer ready unit, comminuting the unit, mixing the comminuted sample and selecting a one pound unit of the comminuted sample, under the inspector's supervision.

34. Question: Can a center slice be used as the sample unit?

Answer: Yes, but only when a center slice is being sold as the consumer unit. Since the minimum sample size submitted to the laboratory is one pound, more than one center slice may be needed.

35. Question: When the sample request directs the inspector to sample the product "ham", in a plant that produces whole hams, center slices, butts, or shank portions from the same lot, what product does the inspector sample?

Answer: All products (hams, shank portions, butt portions, and slices) produced on one shift are treated as one lot for sampling purposes and the sample units selected are randomly chosen, regardless of their form, unless the plant has a letter on file as per Question 103, page 21.

36. Question: Can the inspector take more samples during periodic sampling at the processors request?

Answer: No.

37. Question: Does the computer make a determination as to which product will be sampled?

Answer: Yes, but with alternatives from the same Group. In the event the products or alternatives are not available, the forms are returned to (the Regional Office) and products from other Groups are not sampled.

38. Question: If only a partial lot is available for sampling, are the results of the sampling included in the determination of the Group/Product Values?

Answer: Yes.

39. Question: Does a sample represent all of the product produced in all Groups?

Answer: No. During periodic and daily sampling, it represents all products from the group from which it was selected.



40. Question: Is sampling increased during holiday periods?  
Answer: Sampling rates are based on sample results, --good results mean less sampling, bad results mean more sampling; however, production volume does affect sampling frequencies.

41. Question: For sampling purposes, should processors be encouraged to grind their samples rather than submitting a whole product unit as a sample?

Answer: No.

42. Question: Are plants allowed to devise a sampling plan for the retention phase which is different than the one which is included in the regulation?

Answer: Yes. The sampling plan must be as effective as the one specified in the regulation and must be approved by the Administrator prior to its use during the retention phase.

43. Question: Is a Group Value maintained for ham patties?

Answer: Yes. All products under the purview of this regulation will have a Group Value and a Product Value.

44. Question: Is a steam cooked product placed in the same Group as water cooked product?

Answer: Yes, if they are packaged in the same manner.

45. Question: If a processor is producing a boneless cooked ham in an impervious casing, is it considered to be a Group I product?

Answer: Yes. Any product which is imperviously encased, is a Group I product no matter whether it is canned, in an impervious nylon casing, or in a plastic cook-in bag, boneless or bone-in.

46. Question: If one product goes into retention, can it be removed from the Group and monitored separately?

Answer: Yes. If the average production rate of the product over the 8-week period preceeding the week in which the retention occurred, is not greater than 20 percent of the rate of production of its Group.

47. Question: Can the inspector take action based on Product or Group Value results without input from the computer?

Answer: No. The inspector is not expected to keep track of the Product Values or the Group Values and does not take any action on Product Values or Group Values unless requested by the computer.

48. Question: If a processor keeps track of the Product Values and

the Group Values, can the processor determine when retention of any given product is coming?

Answer: Yes. It is recommended that the processor keep informed of the Product Values and the Group Values, as determined by FSIS.

49. Question: If the processor maintains Group Value and Product Value charts with or without computer assistance, should the inspector use the processor's charts?

Answer: No.

50. Question: If a processor is producing several Groups of products and one Group goes into daily or retention phase sampling, how does this affect the sampling of the other Groups?

Answer: It does not.

51. Question: Does the inspector do any calculations associated with PFF compliance?

Answer: Yes. In plant using accredited laboratories, the inspector is expected to determine the PFF of the sample, and determine if the PFF of the sample is equal to or below the Absolute Minimum PFF. The inspector also determines the lot average PFF on retained lots and compare them to the applicable standards to determine if the retained product may be released or if it needs to be reprocessed or relabeled.

52. Question: What does "like product" mean?

Answer: "Like product" is product within the same group, meeting the same PFF standard, and bearing the same common and usual name.

53. Question: Are all boneless hams, even though the boneless hams may represent different quality levels, net weights, and brand names, considered to be a single product?

Answer: Yes. All products which are in the same Group and labeled with the same common and usual name are considered "like product."

54. Question: Can two samples be collected from the same group on the same day?

Answer: No. Except during retention sampling.

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UPDATE OF PROTEIN FAT FREE (PFF)  
INSTRUCTIONS (CON'T)

ATTACHMENT 1 Questions and Answers Guide - Cured Pork Products (CON'T)  
IV. RETENTION

55. Question: If a product is in retention and the Product Value is equal to or greater than zero, and all other parameters for getting out of retention are satisfied, but the variability of the process is still high, will the product remain in retention?

Answer: No.

56. Question: If a regular ham was found to be out of compliance with the standard and retention was initiated, does it affect the compliance of the water added hams?

Answer: No.

57. Question: Are the three samples taken during retention (to determine the lot average PFF) analyzed for PFF independently or will they be a composite sample?

Answer: Independently and results averaged.

58. Question: Is the variability among the three separate samples from the retained lot evaluated and used?

Answer: No.

59. Question: How are the three samples taken from retained lots evaluated?

Answer: The average of the three samples are used for determining the disposition of the lot. The average is entered into the appropriate Product and Group Value calculations. The PFF analyses of the individual samples are compared to the Absolute Minimum requirement, and utilized to determine when the product returns to daily or periodic sampling.

60. Question: During retention, does the five lot minimum reflect five days' production or five shifts' production?

Answer: Five consecutive shifts.

61. Question: Once the inspector has determined that the sample PFF is equal to or less than the Absolute Minimum, does the inspector begin retention activities?

Answer: Yes. In addition, the inspector has the responsibility

to retain product.

62. Question: If a processor produces both canned ham and regular smoked ham and one of the two goes into retention, are they both placed under retention?

Answer: No. These two products belong to different groups as defined by the regulation and the retention of one does not cause the retention of the other.

63. Question: What happens when the PFF of a sample is equal to or less than the Absolute Minimum?

Answer: The lot which is represented by the sample is retained and each subsequently produced lot of like product is placed under retention. The average PFF of each lot is determined and a decision is made to release, reprocess or relabel product. At the same time, the group should be placed in Daily Sampling.

64. Question: During retention of a product with four labels, how does the inspector sample the products? Is product with each of the four labels sampled?

Answer: Three samples are randomly selected under the retention phase. Therefore, all labels may not be sampled.

65. Question: If a processor's product goes into retention, can the PFF result (a single sample) that triggered the retention be the basis for calculating the shrink needed to bring the lot into compliance?

Answer: No. Once retention is triggered, a three sample average is necessary to determine an accurate lot average PFF upon which to base the decision on the disposition of the product; however, sampling alternatives will be considered if shown to be valid.

66. Question: How can retained product be released?

Answer: It must be sampled to determine the lot average PFF and may be released only if the lot average PFF is equal to or higher than the standard, otherwise it may be reprocessed until it meets the standard or be relabeled.

67. Question: If a retained lot has been sampled and one of the three samples is below the Absolute Minimum, but the lot average PFF equals the standard, can the lot be released?

Answer: Yes. Compliance of the retained lot is based upon the lot average PFF as determined by the three sample average. The three sample average must be equal to or higher than the applicable standard. However, the sample which is equal to or less than the Absolute Minimum could delay the return to the daily and periodic sampling phases from the retention phase.

68. Question: If canned ham is retained, can it be reprocessed or relabeled?

Answer: Yes.

69. Question: If a plant has a product that goes into retention, can the lot size then be reduced while the product is in retention status?

Answer: No. Lot sizes while in retention status must be substantially the same as they were prior to retention. The purpose of retention status is to make necessary process changes and demonstrate reestablishment of process control. If lot sizes are different, they are not representative of the process in question.

70. Question: Can the results from one sample put the plant into retention?

Answer: Yes, if that Sample PFF Value is equal to or less than the Absolute Minimum or if the Sample Value causes the Group Value and Product Value to fall below the Action Limits.

#### V. ADDED PROTEINS

71. Question: How are the added proteins identified as added proteins?

Answer: By the inspector in the plant knowing about the addition of the protein containing ingredients and reporting them to the laboratories.

72. Question: How is the meat protein content of an additive determined when the inspector cannot determine the protein content of the additive?

Answer: The inspector informs the laboratory of the quantity of the additive used and that the protein level is unknown. The laboratory deducts the highest amount of protein which is known to exist in the additive being used.

73. Question: If the protein content of an additive varies; or an additive is reformulated to include more or less protein than the original formula, how does the inspector know which level of protein to report to the laboratory?

Answer: The processor is responsible for notifying the inspector if the protein content changes. The inspector informs the laboratory of the additive and the percentage content of protein. In addition, the inspector may request the laboratory to do a protein analysis on the pickle.

74. Question: If 0.5 percent protein is added to a cured pork product, is 0.5% protein deducted from the total protein to obtain the meat

protein used in calculating the PFF?

Answer: All non-meat proteins are deducted on a finished product basis. Although unlikely, more than 0.5 percent may be deducted if the finished product yield is less than the green weight.

75. Question: If a protein-containing ingredient is used in a cured pork product and the label of the ingredient includes a statement as to the percent protein contained in the ingredient, is the label statement accepted as a declaration of protein content?

Answer: Yes, but that does not mean the inspector may not occasionally sample.

76. Question: If the processor does not use any protein additives, should the inspector note smokehouse and cooler shrink on the sample request form?

Answer: No.

77. Question: Are plants required to certify the amount of protein in added ingredients?

Answer: No. The inspector records the amount of the added ingredients containing proteins used in the products and the percent of protein found in the added ingredient if it is available. If the amount of protein in the added ingredient is not available to the inspector, the laboratory deducts the maximum percent of protein normally found in that ingredient.

78. Question: How are protein-containing flavorings added to curing solutions detected by the compliance system and subtracted from the total protein to provide the meat protein content?

Answer: All additives which contain protein--including flavorings--are reported to the laboratory by the inspector and noted on the sample request form so that they may be deducted from the total protein as added proteins. Sampling of additives in a pickle may occasionally be necessary.

79. Question: Is any credit for the loss of protein during cooking allowed by the PFF regulation?

Answer: No.

80. Question: Are substances such as pork broth, dried beef stock, etc., which are added for flavor or to enhance flavor, permitted in PFF controlled products?

Answer: Yes. However, the protein contributed by such ingredients is deducted when determining the PFF value.

81. Question: Is a cured pork product that is subject to the PFF regulation but contains poultry regulated under PFF?

Answer: Yes. The protein contributed by the poultry which is added for meat is not deducted to determine the PFF.

82. Question: Is collagen or other proteinaceous material, used for any purpose such as an outer wrapping or coating, deducted as an added meat protein?

Answer: Yes.

## VI. QUALITY CONTROL

83. Question: Can a quality control (QC) program be established in a plant without having a QC laboratory in the plant?

Answer: Yes.

84. Question: How often is sampling of products required in a QC program?

Answer: There has not been any establishment of guidelines on the frequency of sampling in a PFF QC program. Sampling frequencies must take into account such things as type of in-process controls, volume, variability, product lines, etc.

85. Question: How is the X in the X percent product controlled?

Answer: By formulation and yield, i.e., in-plant control. However, laboratory analysis may supplement the control program. At a later date if laboratory analysis can be effective, it will be considered.

86. Question: If a product was labeled as "X percent" of weight is added ingredients," is variation allowed around the "X percent".

Answer: Some variation around the "X percent" is allowed.

87. Question: Are guidelines on the preparation of a PFF QC program available for use and distributed to industry?

Answer: Yes. Copies are available from the regional offices.

88. Question: Is a processor who has an approved QC program included in the FSIS monitoring system specified in the PFF regulation?

Answer: No.

89. Question: Can the yield data be used as part of the process control rather than the compliance system established by the regulation?

Answer: Yes, if it is part of an approved QC program. Occasional verification sampling will be necessary.

90. Question: Are the control methods used in the PFF regulation adequate for use in a QC program?

Answer: No. The approaches used in the PFF regulation would be acceptable for use in the TQC system or a PQC program, but the system used in the PFF regulation is a monitoring system and not a control system. So, a QC program which mimics the PFF regulation is not adequate to control a process and is not acceptable.

91. Question: Who handles sampling for a TQC plant?

Answer: The plants, with one exception, i.e., the inspector may select verification samples to monitor the QC activity.

92. Question: Can data collected on past production be used to document the adequacy of a QC system or program?

Answer: Yes, if the process is unchanged.

## VII. LABORATORIES

93. Question: If a yield test indicates the product is in compliance, but the laboratory results indicate that the product is not in compliance, which result takes precedence?

Answer: The laboratory result takes precedence under the PFF compliance system.

94. Question: Are processors allowed to use accredited laboratories for fat and protein analyses?

Answer: Yes.

95. Question: Do inspectors receive results from the accredited labs?

Answer: Yes. The information flow between the inspector and the accredited labs has not changed.

## VIII. IMPORTS

96. Question: Are imported products subject to the same PFF standards?

Answer: Yes.

## IX. EXEMPTIONS



97. Question: Are cured pork products prepared under custom exemption subject to the PFF regulation?

Answer: No, because these products do not carry the mark of inspection.

98. Question: Are cured pork products prepared under retail exemption subject to the PFF regulation?

Answer: No, because these products do not carry the mark of inspection.

#### X. STATE PROGRAMS

99. Question: How does the PFF regulation affect state inspected plants?

Answer: All cured pork products produced in state plants must comply with the PFF standards.

100. Question: Is a state plant a part of the PFF directed sampling and compliance system?

Answer: Yes, unless they have an approved QC program.

#### XI. OTHER

101. Question: Do processors need to continue submitting processing procedures for cured pork products to the inspector as they have under the current regulation?

Answer: Yes. The inspector must have the processing procedures to monitor the use of restricted ingredients and processing procedures.

102. Question: How are Talmadge-Aiken plants treated under the PFF regulation?

Answer: The same as any other federally inspected plant.

#### XII. NEW STATEMENTS

103. Question: May a processor elect to base their PFF program on the unportioned finished product before it is portioned and packaged?

Answer: Yes. The processor must issue a letter to this effect alerting the FSIS program employee of its desire so that sampling will be done in an appropriate manner.

#### ATTACHMENT 2

TABLE TO DETERMINE X PERCENT ON RETAINED PRODUCT  
LABEL WHEN FAT AND PFF ARE KNOWN

PFF

PERCENT

FAT 10.0 10.5 11.0 11.5 12.0 12.5 13.0 13.5 14.0 14.5 15.0 15.5 16.0 16.5

-Up To

0.5	35	35	35	35	30	30	30	30	25	25	25	25	20	20
3.5	35	35	35	35	30	30	30	30	25	25	25	20	20	20
4.0	35	35	35	30	30	30	30	30	25	25	25	20	20	20
8.5	35	35	35	30	30	30	30	25	25	25	25	20	20	20
9.0	35	35	30	30	30	30	30	25	25	25	25	20	20	20
10.0	35	35	30	30	30	30	30	25	25	25	20	20	20	20
13.0	35	35	30	30	30	30	25	25	25	25	20	20	20	20
15.5	35	30	30	30	30	30	25	25	25	25	20	20	20	20*
16.5	35	30	30	30	30	25	25	25	25	25	20	20	20	20*
17.0	35	30	30	30	30	25	25	25	25	20	20	20	20	20*
20.5	30	30	30	30	30	25	25	25	25	20	20	20	20	20*
22.0	30	30	30	30	25	25	25	25	25	20	20	20	20	20*
22.5	30	30	30	30	25	25	25	25	25	20	20	20	20*	20*
25.0	30	30	30	30	25	25	25	25	20	20	20	20	20*	20*
28.0	30	30	30	25	25	25	25	25	20	20	20	20	20*	20*
28.5	30	30	30	25	25	25	25	20	20	20	20	20	20*	20*
29.5	30	30	25	25	25	25	25	20	20	20	20	20	20*	20*
32.0	30	30	25	25	25	25	25	20	20	20	20	20*	20*	20*
32.5	30	25	25	25	25	25	25	20	20	20	20	20*	20*	20*
35.5	30	25	25	25	25	25	20	20	20	20	20	20*	20*	20*
36.5	25	25	25	25	25	25	20	20	20	20	20*	20*	20*	20*
40.5	25	25	25	25	25	20	20	20	20	20	20*	20*	20*	20*
41.0	25	25	25	25	20	20	20	20	20	20	20*	20*	20*	20*
43.5	25	25	25	25	20	20	20	20	20	20*	20*	20*	20*	20*
45.0	25	25	25	20	20	20	20	20	20	20*	20*	20*	20*	20*
45.5	25	25	25	20	20	20	20	20	20	20*	20*	20*	20*	20*
46.5	25	25	25	20	20	20	20	20	20*	20*	20*	20*	20*	20*
49.0	25	25	20	20	20	20	20	20	20*	20*	20*	20*	20*	20*
50.0	25	20	20	20	20	20	20	20*	20*	20*	20*	20*	20*	20*

\*This indicates that the actual value determined is less than the value given but 20 percent is the least value allowed on an X percent label.

ATTACHMENT 3

PFF CURED PORK PRODUCTS

PRODUCT CODE	MINIMUM PFF VALUE	DESCRIPTION
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01	20.5	Ham, Heat Treated
02	18.5	Ham/Natural Juices, Heat Treated
03	17.0	Ham/Water Added, Heat Treated
04	20.5	Loin, Heat Treated
05	18.5	Loin/Natural Juices, Heat Treated
06	17.0	Loin/Water Added, Heat Treated

07	20.0	Shoulder, Heat Treated
08	18.0	Shoulder/Natural Juices, Heat Treated
09	16.5	Shoulder/Water Added, Heat Treated
10	20.0	Butt, Heat Treated
11	18.0	Butt/Natural Juices, Heat Treated
12	16.5	Butt/Water Added, Heat Treated
13	20.0	Picnic, Heat Treated
14	18.0	Picnic/Natural Juices, Heat Treated
15	16.5	Picnic/Water Added, Heat Treated
16	19.5	Spiced/Pressed/Chopped Ham, Heat Treated
17	17.5	Spiced/Pressed/Chopped Ham/Natural Juices, Heat Treated
18	16.0	Spiced/Pressed Chopped Ham/Water Added, Heat Treated
19	20.5	Ham Shanks, Heat Treated
20	18.5	Ham Shanks/Natural Juices/Heat Treated
21	17.0	Ham Shanks/Water Added, Heat Treated
25	19.5	Patties, Heat Treated
27	17.5	Patties/Natural Juices
28	16.0	Patties/Water Added
26	18.0	Ham, Not Heat Treated
44	18.0	Ham Shanks, Not Heat Treated
29	18.0	Loin, Not Heat Treated
32	17.5	Shoulder, Not Heat Treated
3X	17.5	Butt, Not Heat Treated
38	17.5	Picnic, Not Heat Treated
51	00.0	No Alternate Product Available